

DEPARTMENT OF COMMERCE  
National Telecommunications and Information Administration

DEPARTMENT OF AGRICULTURE

Rural Utilities Service

Joint request for information:

Broadband Initiatives Program  
and Broadband Technology  
Opportunities Program

Docket Number: 0907141137–91375–05

### **Comments of the Prometheus Radio Project**

The Prometheus Radio Project would like to thank the RUS and NTIA for their invitation for public participation in improving the application process for the Broadband Initiatives Program of the Rural Utilities Service, Department of Agriculture, and the Broadband Technology Opportunities Program of the National Telecommunications and Information Administration, Department of Commerce. We see these programs as an incredible opportunity to develop inclusive and widespread communications infrastructure in the United States.

The Prometheus Radio Project has a long history of participation in the development of communications policy, focusing primarily on issues of media ownership and advocacy for community and low power radio stations. We also work in the field as a support organization for grassroots media organizations, from those who have radio stations to those that wish to acquire radio licenses. Through participating in this Request for Information, we hope to ensure that broadband stimulus applications will be awarded to institutions with high levels of community participation, so that these funds can create the greatest net impact on the development of their surrounding communities.

Although we have also signed on the comments of the New America Foundation, we offer the following brief recommendations based on our specific experience as a longtime national media policy organization with a base in the grassroots.

#### **I. Application Review Process Streamlining the Application Process**

***How should NTIA link broadband infrastructure, public computer center and sustainable adoption projects through the application process?***

The Prometheus Radio Project believes that there should be a way for applications that cover more than one programming area – such as Public Computing Centers and Sustainable Broadband Adoption

– to submit a single, coherent application, or more easily link applications to avoid the repetition of information.

### **Specification of Service Areas.**

***What level of data collection and documentation should be required of applicants to establish the boundaries of the proposed funded service areas?***

For PCC and SBA applications, NTIA should allow other forms of proof such as affordability of access, access policies, publicly available socioeconomic information, alongside consideration of their mission, track record of those served, and partnerships.

## **II. Policy Issues addressed in the NOFA**

### **Funding Priorities and Objectives**

***RUS and NTIA welcome suggestions for targeted funding proposals and seek comment on how they can better target their remaining funds to achieve the goals of the Recovery Act...***

**A more comprehensive understanding of "anchor institutions" is needed to direct funding priorities**

Community media centers, such as community radio stations, should be considered anchor institutions, alongside libraries and schools as central non-governmental organizations that can promote digital literacy and inclusion. These institutions serve as focal points within their communities for both the production and dissemination of information and culture.

Community Radio stations in particular should be considered anchor institutions as they are endowed with Emergency Alert Systems, which are activated during natural disasters and "Amber alerts". This highlights their key role in emergency preparedness and underscores the fact that many people – in particular the elderly and those without internet access – continue to use radio as a primary source of information, especially in times of crisis.

### **Middle Mile “Comprehensive Community” Projects.**

***To the extent that RUS and NTIA do focus the remaining funds on "comprehensive community" projects, what attributes should the agencies be looking for in such projects?***

***Should we consider the number of existing community anchor institutions that intend to connect to the middle mile network as well as the number of unserved and underserved communities and vulnerable populations (i.e., elderly, low-income, minority) that it will cover?***

Users of broadband should be encouraged to be producers, as opposed to just consumers of information and media. This kind of comprehensive approach will have a transformative impact on community development and drive economic growth by developing skills within the community to fully participate in our emerging information society.

In order to develop this level of interaction with the internet, RUS and NTIA should prioritize projects that focus on sharing media production skills and access to media production equipment; community media centers should be prioritized for funding.

**Funds should be increased in the Public Computing Center application pool.**

In order to encourage the development of "comprehensive community" projects, funds should be increased in the Public Computing Center application pool. These funds are ideal for attracting applicants from small community centers that already provide services and have developed constituencies within their communities.

**Support interstate partnerships of grassroots organizations**

Prometheus supports the focus on localism inherent in the broadband-related programs of the American Reinvestment and Recovery Act of 2009. That said, we believe that partnerships that link grassroots community organizations, such as community radio stations, across state lines should be encouraged by the BTOP program. Such partnerships will help build a shared base of knowledge and best practices and lead to greater efficiency.

Respectfully submitted,

/s/

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